

# EXHIBIT B

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**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
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**BY EMAIL**

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**Re:   *United States v. Mark Scott,*  
      **S8 17 Cr. 630 (ER)****

Dear Counsel:

The Government hereby provides notice, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, of the following testimony that it intends to offer at trial in the above-referenced case.

The Government expects to call as a witness at trial an expert in the means and methods of money laundering and the evasion/obstruction of policies and procedures employed by banks and other financial institutions to combat money laundering activities. The biographical information and/or curriculum vitae will be provided when the particular witness has been identified. If called, the Government anticipates that the witness will testify as to—among other means and methods of laundering funds and evading/obstructing banks' anti-money laundering procedures—the use of shell companies; the use of nominee directors, principals, and ultimate beneficial owners ("UBOs"); the layering of funds through a series of financial accounts; the so-called "papering" of otherwise illegal transactions to make the transactions appear legitimate; and other ways in which false representations may be made to financial institutions to facilitate money laundering activities.<sup>1</sup> Note that any such witness will not be asked to testify to his or her

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<sup>1</sup> Expert testimony regarding the means and methods of money laundering has been admitted by trial courts and upheld by the Second Circuit on numerous occasions. *See, e.g., United States v. Muzaffar*, 714 F. App'x 52, 55 (2d Cir. 2017) (affirming admission of testimony from

